

No. PD-\_\_\_\_-20

**KEDREEN MARQUE PUGH,**  
*Appellant-Respondent*

v.

**STATE of TEXAS,**  
*Appellee-Petitioner*

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**IN THE COURT OF**  
 COURT OF CRIMINAL APPEALS  
 7/3/2020  
 DEANA WILLIAMSON, CLERK  
  
**CRIMINAL APPEALS**  
  
**AUSTIN, TEXAS**

**STATE'S MOTION FOR EXTENSION OF TIME TO FILE**  
**PETITION FOR DISCRETIONARY REVIEW**

TO THE HONORABLE COURT OF CRIMINAL APPEALS:

NOW COMES the State of Texas, by and through Joe D. Gonzales, Criminal District Attorney of Bexar County, Texas, and the undersigned assistant criminal district attorney, with the filing of this motion asking the Court to extend the time for filing the State's petition for discretionary review in the above styled cause.

**I. STATEMENT OF THE CASE**

Appellant-Respondent was indicted for and convicted of possession with intent to deliver a controlled substance PG 1 4 grams to 200 grams under Bexar County cause number 2018-CR-6053. The Fourth Court of Appeals reversed the trial court's judgment on April 15, 2020 under cause number 04-19-00516-CR. The Fourth Court of Appeals subsequently denied the State's motion for rehearing on May 20, 2020. The State's petition is due June 19, 2020. This is the State's first request for an extension.

## II. REASONS FOR THE REQUEST

The undersigned counsel returned from maternity leave in late May. Further, undersigned counsel is working on briefs and responses in *Arroyo v. State*, No. 04-19-00216-CR (Fourth Court of Appeals, response to reply brief) and *Allen v. State*, No. 13-19-00494-CR (Thirteenth Court of Appeals, merits brief). Counsel does not anticipate requiring any additional extensions of time to file the petition.

## III. PRAYER

WHEREFORE, PREMISES CONSIDERED, Counsel for the State prays the Court grants an extension of time for an additional 30 days to file the petition for discretionary review in this case.

Respectfully submitted,

JOE D. GONZALES  
*Criminal District Attorney*  
Bexar County Texas

/s/ *Jennifer Rossmeier Brown*

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*Attorneys for the State of Texas*

**CERTIFICATE OF SERVICE**

I, Jennifer Rossmeier Brown, certify that a copy of the foregoing motion has been emailed to Debra L. Parker and the Office of the State Prosecuting Attorney on June 19, 2020.

/s/ *Jennifer Rossmeier Brown*

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Bexar County DA Appeals Division on behalf of Jennifer Rossmeier  
Bar No. 24079247  
DAAppealsDivision@bexar.org  
Envelope ID: 43905751  
Status as of 07/03/2020 09:41:05 AM -05:00

Associated Case Party: Kedreen Pugh

Name	BarNumber	Email	TimestampSubmitted	Status
Debra L. Parker	794112	debraparkerlaw@gmail.com	6/19/2020 5:22:55 PM	SENT

Associated Case Party: Bexar County District Attorney's Office

Name	BarNumber	Email	TimestampSubmitted	Status
Jennifer RossmeierBrown		jennifer.brown@bexar.org	6/19/2020 5:22:55 PM	SENT